



June 13, 2023

**VIA CM/ECF**

The Honorable Yvonne Gonzalez Rogers, District Judge  
Oakland Courthouse, Courtroom 1 – 4<sup>th</sup> Floor  
1301 Clay Street  
Oakland, CA 94612

**Re: *In re Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*  
Case No. 4:22-md-03047-YGR**

Your Honor:

Our firm, along with co-counsel, represent the City of Providence, a large municipality that filed a complaint against the social media companies, which was transferred to the above-referenced MDL on May 23, 2023. We write regarding a June 12, 2023 notice filed in the MDL requesting that the Court establish a subcommittee of six (6) members responsible for overseeing and litigating issues unique to school districts and other governmental entities, like the City of Providence (the “Notice”). *See* ECF No. 310. Although ostensibly filed on all Plaintiffs’ behalf, we were not consulted, notified, or contacted prior to the filing of this Notice. While we support the creation of a subcommittee to represent governmental entities, we respectfully request that counsel for City of Providence be appointed to the Government Entity Subcommittee or that the Court set a briefing schedule so that counsel for the City of Providence may apply to be named as a member of the Government Entity Subcommittee.

None of the firms identified in the proposed leadership structure represent a large municipality like the City of Providence. These firms also do not represent any governmental entities from New England. Defendants’ conduct has caused significant harm to communities throughout this country, including cities and municipalities in New England. Therefore, it is imperative that the Government Entity Subcommittee include counsel for the City of Providence to ensure better representation of the communities affected by Defendants’ conduct.

In addition, counsel for the City of Providence include one of the nation’s largest firms specializing in the prosecution of complex litigation and has developed a reputation for excellence in litigating complex cases, including complex consumer fraud, unfair and deceptive trade practices, and antitrust actions, and has recovered billions of dollars on behalf of clients like the City of Providence. Accordingly, we respectfully request that the Court appoint counsel for City of Providence to the Government Entity Subcommittee or, in the alternative, set a briefing schedule so that counsel for the City of Providence may apply to be named as a member of the Government Entity Subcommittee.

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Thank you for your consideration.

Respectfully,

KESSLER TOPAZ  
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